

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FORTRESS VALUE RECOVERY FUND I, LLC)	Case No. 1:11-CV-00200
)	
)	JUDGE JAMES S. GWIN
Plaintiff,)	
)	
v.)	MAGISTRATE JUDGE WILLIAM H.
)	BAUGHMAN
)	
COLUMBUS COMPONENTS GROUP, LLC, et al.)	<u>UNOPPOSED MOTION OF</u>
)	<u>DEFENDANTS TO EXTEND EXPERT</u>
)	<u>IDENTIFICATION DEADLINE</u>
Defendants.)	

Now come Defendants, Columbus Components Group, LLC, CCG Holdings, LLC, PJ Management Group, LLC, Hawthorn Manufacturing Corporation and Patrick James (collectively the "Defendants"), by and through undersigned counsel, and hereby move this Court for a brief, two-week extension of the June 1, 2011 deadline for Defendants to identify their expert witnesses (the "Expert Identification Deadline"). (*See* Doc. No. 41) The requested extension would not only afford the parties the opportunity to complete their discussion relating to the dismissal of this lawsuit, but is also unopposed by Plaintiff, Fortress Value Recovery Fund I, LLC ("Plaintiff").¹ If the Parties are able to agree on the dismissal of this case, such a dismissal would likely occur during the requested two week extension period.

Moreover, this brief extension of time would not have an effect on the current Case Management Schedule, including the trial scheduled on a two-week standby period beginning on November 7, 2011. (*See* Doc. No. 40). Therefore, this unopposed motion to extend Defendants' Expert Identification Deadline by two-weeks will neither delay the administration of this case, nor prejudice the Parties.

¹ The Plaintiff and Defendants are hereinafter defined as the "Parties."

For the foregoing reasons, Defendants respectfully request this Court extend their current Expert Identification Deadline from June 1, 2011 to June 15, 2011. A proposed Order is attached hereto for the Court's convenience.

Respectfully submitted,

/s/ Pete C. Elliott

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of May, 2011, a true and complete copy of the foregoing was filed electronically. Service on all the parties of record will be made through the Court's Electronic Filing System. The parties may access this filing through the Court's Electronic Filing System.

/s/ Pete C. Elliott

*One of the Attorneys for Defendant Hawthorn
Manufacturing Corporation*